

FILED

SEP - 7 2022

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
V.) No. S1-4:22-CR-00055-RLW
)
JARED M. DIEHL,)
)
Defendant.)

SUPERSEDING INFORMATION

COUNT I

The United States Attorney charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:

- (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));
- (b) "sexually explicit conduct" to mean actual or simulated
 - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,
 - (ii) bestiality,
 - (iii) masturbation,
 - (iv) sadistic or masochistic abuse, or
 - (v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. §2256(2)(A)); and

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6)).

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.

2. The "Internet" was, and is, a computer communications network using interstate and foreign telephone lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. From on or about May 16, 2019 and September 16, 2020, in the Eastern District of Missouri, and elsewhere,

JARED M. DIEHL,

the defendant herein, did knowingly possess material that contained image files and video files of child pornography that had been transported using any means and facility of interstate and foreign commerce or in and affecting interstate and foreign commerce by any means, including by computer, to wit the defendant knowingly possessed image files and video files of child pornography via the internet utilizing a computer, to include but not limited to the following:

a. An image file that depicts a prepubescent female minor, under the age of twelve years, being anally penetrated by an adult penis; and

b. An image file depicting a prepubescent female minor, under the age of twelve years, whose vagina is lasciviously exhibited and who is lying on top of an adult with an erect penis and with a sign on her leg that reads "Hi! Come play with us! NW-USA-Dad & Dau," in violation of 18 U.S.C. § 2252A(a)(5)(B).

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

s/Jillian Anderson
Jillian S. Anderson, #53918MO
Assistant United States Attorney

UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, Jillian S. Anderson, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

s/Jillian Anderson
Jillian S. Anderson, #53918MO

Subscribed and sworn to before me this 8th day of August 2022.

/s/ Gregory J. Linhares

CLERK, U.S. DISTRICT COURT



By: */s/ David L. Braun*

DEPUTY CLERK